



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DGR  
F. #2016R01326

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 1, 2022

By ECF

The Honorable Margo K. Brodie  
Chief United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Herman Segal,  
Criminal Docket No. 20-551 (MKB)

Dear Chief Judge Brodie:

The government writes in connection with the above-captioned matter, and with the consent of defense counsel, to respectfully request a sixty day adjournment of the status conference currently scheduled for December 2, 2022 at 10:00 a.m.

Since the parties' last appearance before the Court, the parties have continued to review recently exchanged documents in support of the ongoing plea negotiations. The parties are currently working to schedule additional in person meetings to discuss the evidence and proposed pre-trial disposition. Given the ongoing plea discussions and the need for additional time to complete them, and in view of the upcoming holidays, the parties jointly request an adjournment of this matter for sixty days. Additionally, with the consent of defense counsel, the government also asks the Court to exclude time under the Speedy

Trial Act through the new status conference date, which exclusion is in the interests of justice.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/Drew G. Rolle  
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cc: James Mahon, Esq. (Counsel to the defendant) (by ECF)  
Samantha Lesser, Esq. (Counsel to the defendant) (by ECF)